IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

VANDERBILT UNIVERSITY,) Civil Action No. 3:18-cv-00046
Plaintiff, v.	Chief Judge Waverly D. Crenshaw, Jr. Magistrate Judge Jeffery S. Frensley
SCHOLASTIC, INC., HOUGHTON MIFFLIN HARCOURT PUBLISHING COMPANY, and TED S. HASSELBRING,	JURY DEMAND)
Defendants.))

JOINT MOTION OF PLAINTIFF AND DEFENDANTS TO EXTEND THE BRIEFING SCHEDULE FOR DAUBERT AND DISPOSITIVE MOTIONS

Plaintiff Vanderbilt University ("Vanderbilt"), and Defendants Scholastic Inc. ("Scholastic"); Houghton Mifflin Harcourt Publishing Company ("HMH"); and Ted S. Hasselbring jointly move the Court pursuant to Fed. R. Civ. P. 6(b)(1)((A) and 16(a)(4) to enter an Order extending the briefing schedule for the *Daubert* and case dispositive motions currently pending in this case. As grounds and good cause for this motion, the movants state as follows:

- 1. The parties timely filed *Daubert* and dispositive motions on January 22, 2021.
- 2. The current deadline to file responses to the referenced motions is February 26, 2021, with replies to be filed within 14 days from the service of the responsive briefs as set in the Amended Case Management Order (Dkt. 260).
- 3. Because of various personal and professional conflicts and other matters, the parties have

agreed to an extension of 7 days for the deadline to file responses to the Daubert and

dispositive motions, extending the deadline from February 26, 2021 to March 5, 2021.

Further, the parties have agreed to an extension of 5 days for the deadline to file replies

in support of the *Daubert* and dispositive motions, extended the deadline from 14 days

from service of the responsive motions to 19 days from the service of the responsive

motions.

4. Per this extension, the briefing on the *Daubert* and dispositive motions will be completed

by March 24, 2021.

5. There is ample room in the schedule to extend this schedule; the proposed schedule

remains in compliance with Local Rule LR16.01(d)(2.f). The next deadline in the

Amended Case Management Order is the June 4, 2021 deadline to file a final report

regarding mediation. In addition, trial is set to begin August 3, 2021, well more than 90

days after the completion of the briefing on the dispositive motions. Therefore, this

requested extension of the briefing schedule for the *Daubert* and dispositive motions will

not affect other deadlines in this case or the trial date.

For the reasons stated herein, which they submit constitute good cause for the requested

relief, the parties jointly request that the Court amend the Case Management Order to grant an

extension of the briefing schedule for the Daubert and dispositive motions, as set in the

Amended Case Management Order (Dkt. 260), as discussed above. A proposed order is attached

to this Motion.

Dated: February 8, 2021

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AGREED TO AND SUBMITTED BY:

/s/ John W. Harbin

John W. Harbin (pro hac vice)
Mary Katherine Bates (pro hac vice)
Meunier Carlin & Curfman LLC
999 Peachtree Street NE, Suite 1300
Atlanta, GA 30309
jharbin@mcciplaw.com
kbates@mcciplaw.com

Paige W. Mills #016218
Audrey J. Anderson #031910
Mary Leigh Pirtle #026659
Ashleigh Karnell #036074
Bass, Berry & Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201
(615) 742-6200
pmills@bassberry.com
audrey.anderson@bassberry.com
mpirtle@bassberry.com
ashleigh.karnell@bassberry.com

Attorneys for Plaintiff Vanderbilt University

/s/ Benjamin E. Marks

David J. Lender (pro hac vice)
(NY Bar No. 2583722)
Benjamin E. Marks (pro hac vice)
(NY Bar No. 2912921)
Sara Lonks (pro hac vice)
(NY Bar No. 5445630)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
david.lender@weil.com
benjamin.marks@weil.com
sara.lonks@weil.com

Michael G. Abelow (No. 26710) SHERRARD ROE VOIGT & HARBISON, PLC 150 Third Avenue South, Suite 1100

/s/ Edward H. Rosenthall

Nicole Bergstrom (pro hac vice)
Caren Decter (pro hac vice)
Edward H. Rosenthal (pro hac vice)
Viviane K. Scott (pro hac vice)
Frankfurt, Kurnit, Klein & Selz, P.C
28 Liberty Street
New York, NY 10005
(212) 826-5524
cdecter@fkks.com
erosenthal@fkks.com
nbergstrom@fkks.com
vscott@fkks.com

Thor Y, Urness, #13641 Kimberly M. Ingram, #35191 Bradley Arant Boult Cummings LLP Roundabout Plaza 1600 Division Street, Suite 700 Nashville, TN 37203 (615) 244-2582 turness@bradley.com kingram@bradley.com

Attorneys for Defendant, Scholastic Inc.

/s/ Thomas H. Dundon

Thomas H. Dundon, #004539
Aubrey B. Harwell, Jr., #002559
Erik C. Lybeck, #035233
Neal & Harwell, PLC
1201 Demonbreun Street
Suite 1000
Nashville, TN 37203
(615) 244-1713
aharwell@nealharwell.com
tdundon@nealharwell.com
elybeck@nealharwell.com

Attorneys for Defendant, Ted S. Hasselbring

Nashville, TN 37201 (615) 742-4200 mabelow@srvhlaw.com

Attorneys for Defendant, Houghton Mifflin Harcourt Publishing Company